

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

Plaintiff,

v.

**STATE OF RHODE ISLAND and
CITY OF PROVIDENCE,**

Defendants.

Case Nos. CA 14-175; 13-442

JOINT FILING IN ADVANCE OF OCTOBER 30, 2018 STATUS CONFERENCE

In advance of the status conference on Interim Settlement Agreement and Consent Decree compliance scheduled for October 30, 2018, the parties jointly submit the following summary of topics for discussion. The parties anticipate discussion of the Interim Settlement Agreement, followed by discussion of the Consent Decree.

For the Interim Settlement Agreement provisions applicable to both the State of Rhode Island and Providence Public Schools, the parties anticipate that the Court Monitor, counsel for the State of Rhode Island, counsel for Providence Public Schools, and counsel for the United States (in that order) will discuss the following topics:

- 1) **Career Development Planning** – the status of Career Development Planning as required by Section VII of the Interim Settlement Agreement; and
- 2) **Transition Planning for Youth** – the status of Transition Planning for youth as required by Section VIII of the Interim Settlement Agreement; and
- 3) **Any other compliance related issues** that the Court or the parties deem relevant.

For the Interim Settlement Agreement provisions applicable only to the State of Rhode Island, the parties anticipate that the Court Monitor, counsel for the State of Rhode Island, and counsel for the United States (in that order) will discuss the following topics:

- 4) **Employment Placements** - the status of supported employment placements, as required by Section IV of the Interim Settlement Agreement;
- 5) **Day Services** - the status of Integrated Day Services as required by Section VI of the Interim Settlement Agreement; and
- 6) **Any other compliance related issues** that the Court or the parties deem relevant.

For the Consent Decree topics, the parties anticipate that the Court Monitor, counsel for the State of Rhode Island, and counsel for the United States (in that order) will discuss the following topics:

- 7) **Employment Placements** - the status of the State's compliance with achieving Consent Decree placement outcomes for the Youth Exit Target Population, as required by Section IV of the Consent Decree;
- 8) **Day Services** - the status of Integrated Day Services as required by Section VI of the Consent Decree;
- 9) **Career Development Planning** – the status of Career Development Planning as required by Section VII of the Consent Decree; and
- 10) **Any other compliance related issues** that the Court or the parties deem relevant.

Dated: October 23, 2018

Respectfully submitted,

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